



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Jacob K. Javits Federal Building
26 Federal Plaza, 37th Floor
New York, New York 10278*

August 5, 2024

By ECF

The Honorable Colleen McMahon
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

**Re: United States v. Takeshi Ebisawa and Somphop Singhasiri,
S3 22 Cr. 256 (CM)**

Dear Judge McMahon:

The Government writes to respectfully request the Court accelerate the status conference presently scheduled for October 10, 2024, or, alternatively, adjourn that conference and set a date for trial in the above-referenced case.

At the February 22, 2024 conference, the Court directed that any defense motions be filed by July 19, 2024 and set a conference for October 10, 2024 for decision on the motions. At the February 22 conference, the Court instructed that “if you conclude that there are not going to be any motions, I would like you to let me know that by July 19, and we will -- or maybe even littler earlier -- and we will move up the next scheduled date. I will see you then, some time over the summer, and we’ll set a trial date.” (Dkt. 63 at 11).

No defense motions have been filed. Accordingly, the Government respectfully requests the Court set a date for trial. The Government is prepared to appear at any time for a conference, should the Court wish to discuss scheduling with the parties. Alternatively, if the Court prefers to set a trial date without a further status conference, the Government is available for trial in October or November 2024, or in March 2025 or thereafter.¹ Counsel for defendant Takeshi Ebisawa are available for a conference anytime in September 2024, and are available for trial between February and April 2025, or in August 2025 or thereafter.² Counsel for defendant Somphop Singhasiri have not yet apprised the Government of their availability for a conference or trial.

¹ Two of the Assistant United States Attorneys assigned to this case will be on trial before Judge Gardephe in *United States v. Hubei Amarvel Biotech Co., Ltd., et al.*, 23 Cr. 302 (PGG), beginning on January 13, 2025.

² One of Ebisawa’s attorneys will be on trial in October 2024 and in June 2025.

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Should the Court set a trial date without a further status conference, the Government respectfully requests the Court exclude Speedy Trial time until the trial date to accommodate the availability of the defense and the Court, and for the parties to discuss any potential pretrial resolutions.

Respectfully submitted,

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Cc: All counsel of record (*by ECF*)